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*Attorney for Plaintiff Zachary Lasko*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ZACHARY LASKO an individual;

Plaintiff,

vs.

GET FRESH SALES, INC.; EMPLOYEE(S) /  
AGENT(S) DOES 1-10; and ROE  
CORPORATIONS 11-20, inclusive

Defendants.

Case No. 2:22-cv-01176-JAD-BNW

**PLAINTIFF'S COUNSEL'S MOTION  
TO WITHDRAW AS COUNSEL OF  
RECORD**

Jeffrey Gronich of Jeffrey Gronich, Attorney at Law, P.C., as counsel of record for Plaintiff in this matter respectfully moves this Court for an Order permitting him to withdraw as counsel of record in this matter. This Motion is made based upon Nevada Supreme Court Rule (SCR) 46, Local Rule of Practice IA 11-6, Nevada Rule of Professional Conduct (NRPC) 1.16, the following Memorandum of Points and Authorities, and the attached declarations.

Dated this 13<sup>th</sup> day of October, 2022.

Respectfully submitted,

By: /s/ Jeffrey Gronich  
Jeffrey Gronich, Esq.  
Jeffrey Gronich, Attorney at Law, P.C.  
1810 E. Sahara Ave, Suite 109  
Las Vegas, NV 89104  
Tel (702) 430-6896  
Fax (702) 369-1290  
*Attorney for Plaintiff*

## MEMORANDUM OF POINTS AND AUTHORITIES

### **I. Withdrawal Is Permitted Under The Circumstances**

Local Rule of Practice IA 11-6 permits an attorney to withdraw by Motion and order of the court. Similarly, NRPC 1.16(b) permits an attorney to withdraw from representation of a client under the following conditions:

- (1) Withdrawal can be accomplished without material adverse effect on the interests of the client;
- (2) The client persists in a course of action involving the lawyer's services that the lawyer reasonably believes is criminal or fraudulent;
- (3) The client has used the lawyer's services to perpetrate a crime or fraud;
- (4) A client insists upon taking action that the lawyer considers repugnant or with which the lawyer has fundamental disagreement;
- (5) The client fails substantially to fulfill an obligation to the lawyer regarding the lawyer's services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled;
- (6) The representation will result in an unreasonable financial burden on the lawyer or has been rendered unreasonably difficult by the client; or
- (7) Other good cause for withdrawal exists.

Due to the attorney-client privilege and Counsel's duties of confidentiality and loyalty, Counsel cannot disclose the specific circumstances prompting the instant Motion. However, as set forth in the Declaration of Jeffrey Gronich attached hereto as Exhibit I, multiple bases identified in NRPC 1.16(b) exist for Counsel's withdrawal. Generally, the relationship between Counsel and Plaintiff has broken down to the extent that Counsel can no longer effectively represent Plaintiff's interests. Gronich Decl. ¶ 3.

Here, upon information and belief, no attorney has been retained by Plaintiff to represent his interest, so an order of the Court granting withdrawal is necessary. Prior to this Motion, the Parties have stipulated to stay the Early Neutral Evaluation until December 8, 2022 (Dkt. No.

19). The Parties have also agreed to a stay of discovery until one week before the ENE (Dkt. #17). Therefore, there will be no prejudice to Plaintiff as he will either have enough time to obtain new counsel or to get acquainted with his requirements to proceed pro se.

Furthermore, Plaintiff himself consents to the withdrawal as indicated in the attached declaration at Exhibit II.

Counsel will serve a copy of this Motion on Plaintiff and all other parties to this action upon filing.

Consequently, counsel respectfully requests that this Court grant its motion to withdraw as counsel of record for Plaintiff in this matter.

## **II. Conclusion**

Based on the foregoing, Jeffrey Gronich and Jeffrey Gronich, Attorney at Law, P.C. respectfully move this Court to enter the proposed Order at Exhibit III granting his motion for leave to withdraw.

Dated this 13<sup>th</sup> day of October, 2022.

Respectfully submitted,

By: /s/ Jeffrey Gronich  
Jeffrey Gronich, Esq.  
Jeffrey Gronich, Attorney at Law, P.C.  
1810 E. Sahara Ave., Suite 109  
Las Vegas, NV 89104  
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## **ORDER**

IT IS ORDERED that ECF No. 21 is GRANTED.

IT IS FURTHER ORDERED that Jeffrey Gronich must serve a copy of this order on Plaintiff.

IT IS FURTHER ORDERED that the Clerk of Court is directed to update Plaintiff's address consistent with ECF No. 21 at 4.

IT IS SO ORDERED

DATED: 12:18 pm, October 14, 2022



BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE

Jeffrey Gronich, Attorney at Law, P.C.  
1810 E. Sahara Ave., Suite 109  
Las Vegas, Nevada 89104  
(702) 430-6896 FAX: (702) 727-3903

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 13<sup>th</sup> day of October, 2022, I caused to be served a true and correct copy of the foregoing **PLAINTIFF'S COUNSEL'S MOTION TO WITHDRAW AS COUNSEL OF RECORD** on the following person(s) by electronically filing via the CM/ECF system utilized by this Court:

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*Plaintiff*

/s/ Jeffrey Gronich  
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